

United States District Court



Southern District of Texas

<i>Morgans Gray, LLC</i> <i>versus</i> ----- <i>Oxberry General, LLC et al</i>	Case: H- 19-2809
Judge Lynn N. Hughes	Exhibit List
List of:	Case Manager: <input checked="" type="checkbox"/> Glenda Hassan Law Clerk: <input type="checkbox"/> DePena <input checked="" type="checkbox"/> Troutman Proceeding: <i>Conference</i>

No.	Description	Adm	Exd
1	Slide deck for presentation + binder	✓	
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DEFENDANT'S EXHIBIT	
CASE NO.	19-2809
EXHIBIT NO.	1

Morgans Group LLC

v.

5104 Caroline LLC, et al.

Status Conference Hearing

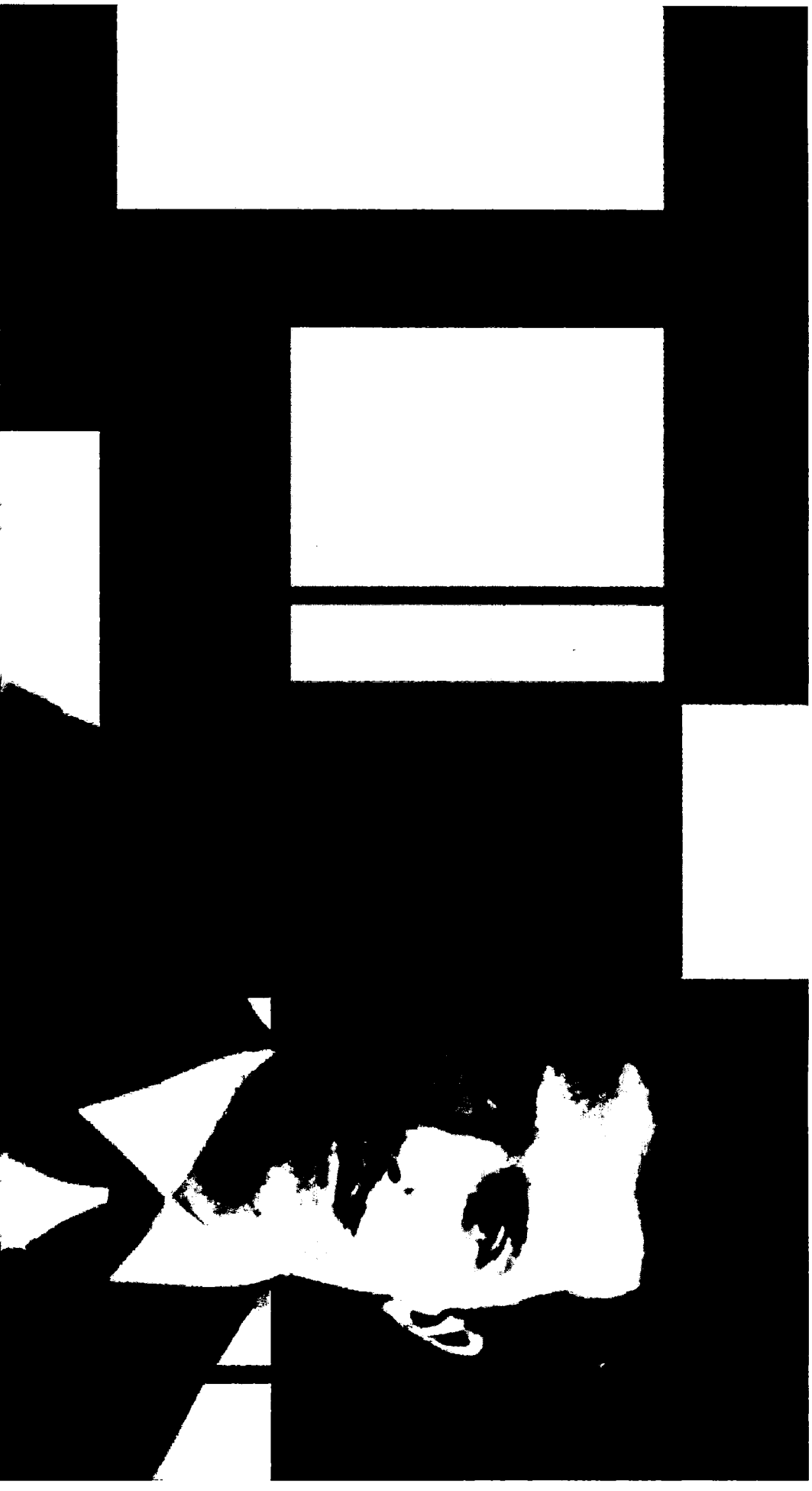
Cause No. 2020-63081

November 23, 2020



AHMAD
ZAVITSANOS
ANAIPAKOS
ALAVI
MENSING

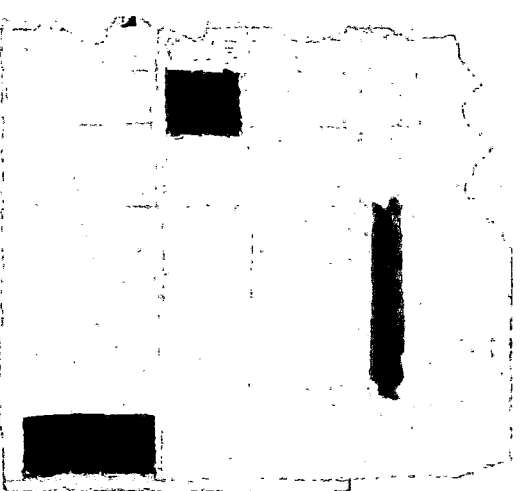
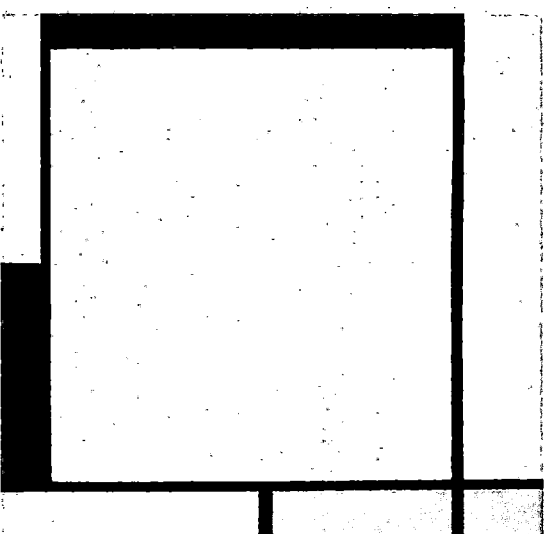
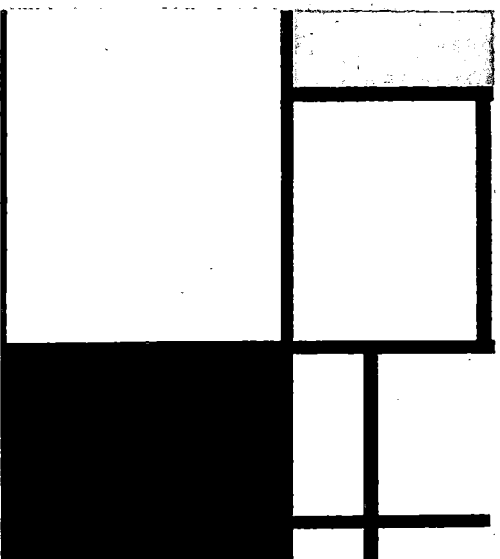




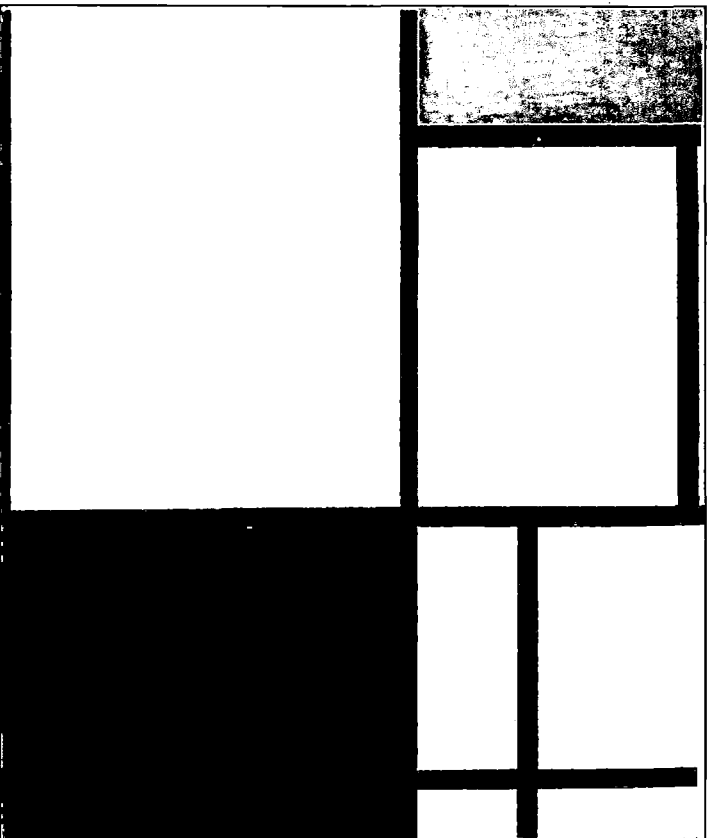
Piet Mondrian, Dutch, 1878-1944

Association with Houston

**Three art pieces by Piet Mondrian at Menil Collection,
Houston, TX**



Mondrian & the Museum District - 1.



Piet Mondrian, Dutch, 1872 - 1944
Composition with Yellow, Blue, and Blue-White, 1922
Menil Collection, Houston, Texas

Source: <https://www.menil.org/collection/objects/4859-composition-with-yellow-blue-and-blue-white>

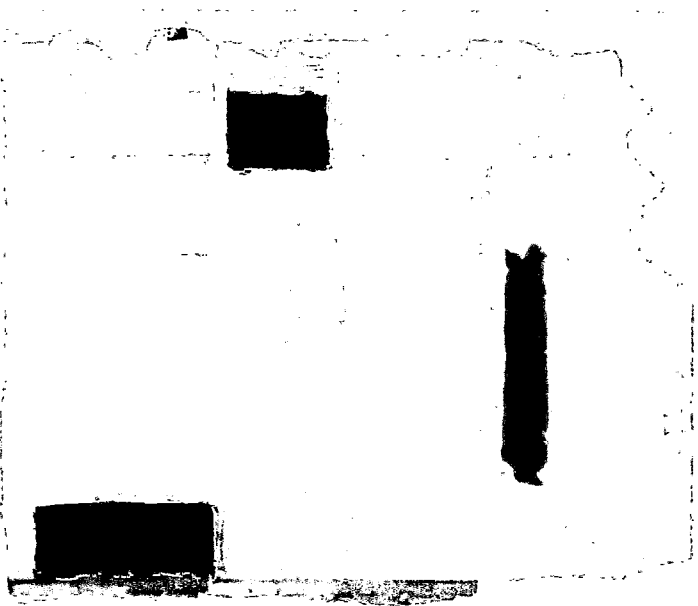
Mondrian & the Museum District - 2



Piet Mondrian, Dutch, 1872 - 1944
Composition with Yellow, Red, and Blue, 1927
Menil Collection, Houston, TX

Source: <https://www.menil.org/collection/objects/4922-composition-with-yellow-red-and-blue>

Mondrian & the Museum District - 3



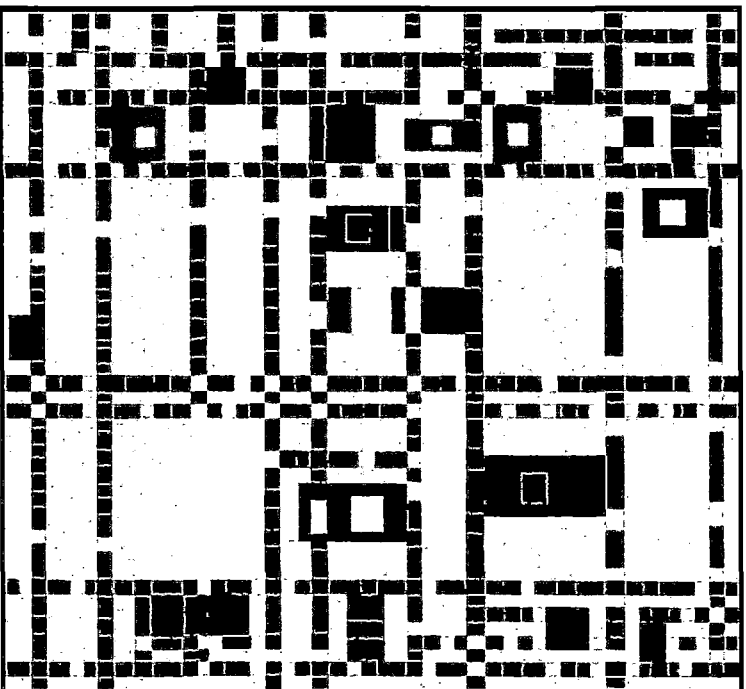
Piet Mondrian, Dutch, 1872 - 1944
Study for a Composition, ca. 1940-1941
Menil Collection, Houston, TX

Source: <https://www.menil.org/collection/objects/839-study-for-a-composition>

Mondrian at MoMA in NYC

26 Mondrian works at the Museum of Modern Art in New York

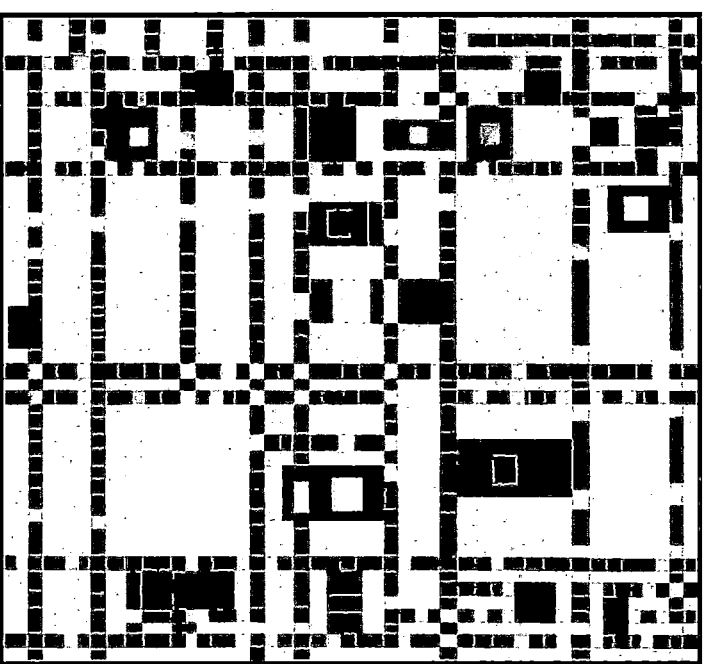
https://www.moma.org/collection/works/78682?artist_id=4057&page=1&sov_referrer=artist



Piet Mondrian
Broadway Boogie Woogie, ca. 1942-43
MoMA, New York, NY

Plaintiff Trades on Mondrian's Name

These are the Mondrian logos. Going back to the very name Mondrian, the concept is influenced by the work of Piet Mondrian with his rigorous and powerful grid. In his work *Broadway Boogie Woogie* he famously translated a city into a few lines of yellow and red. This concept translates the silhouette of each Mondrian building into an abstraction of its line with a signature color. Always use the logo unless using on an area that is too small.



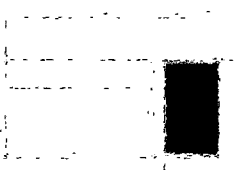
Piet Mondrian

Broadway Boogie Woogie, ca. 1942-43
MoMA, New York, NY

Source: <https://issuu.com/sbe.events/docs/mondrianglobal-0110brandbook?e=8263872/57501946>

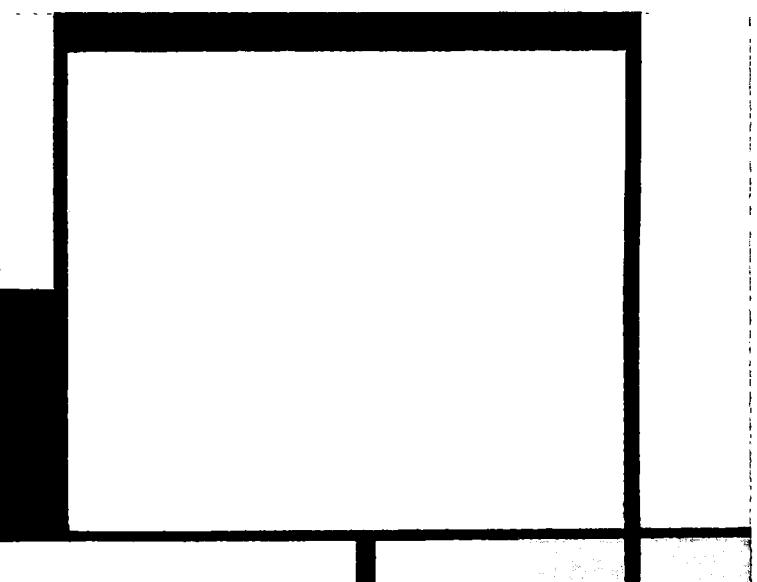
Plaintiff's Mondrian Logo Resembles Artist's Work

**Plaintiff's Mondrian
Corporate Logo**



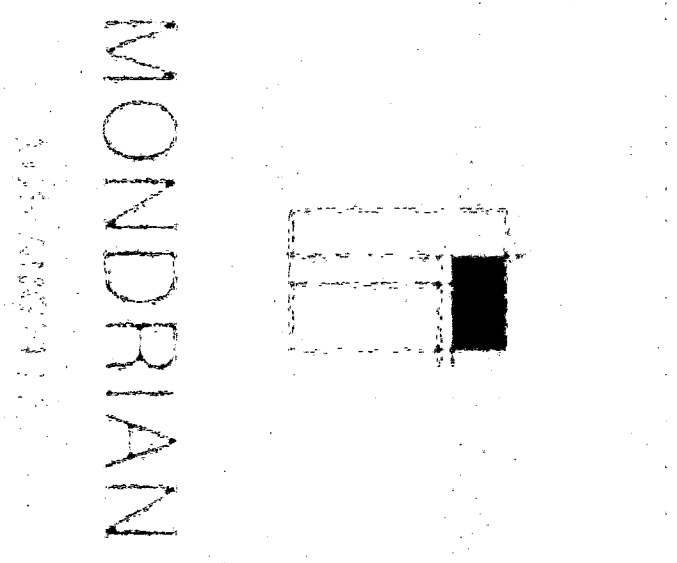
MONDRIAN

**Piet Mondrian
Composition with Yellow, Red, and Blue, 1927
Menil Collection, Houston, Texas**

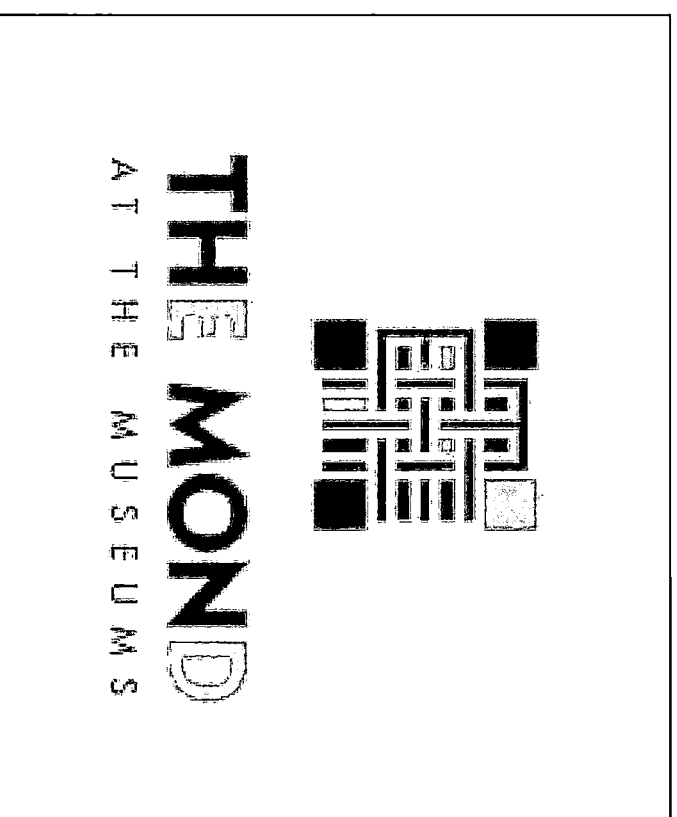


Defendants' Logo Is Completely Different

Plaintiff's Mondrian
Corporate Logo

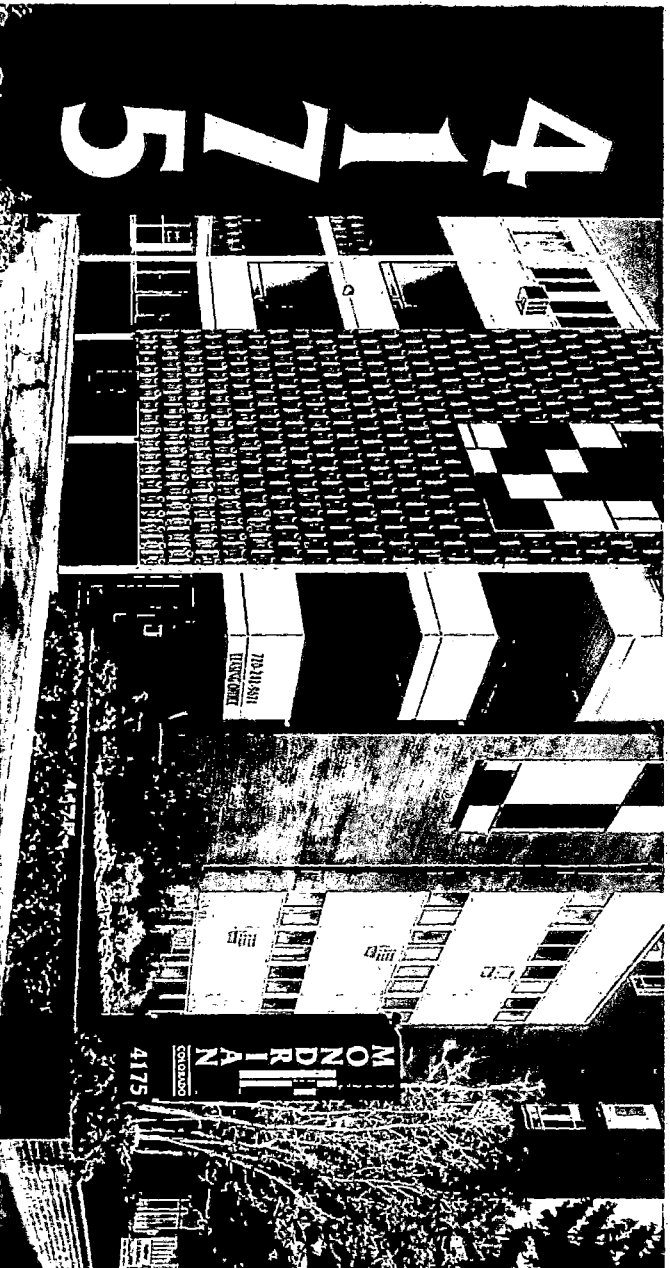


Defendant's Mond at the
Museums Logo



Plaintiff is Late to the Game

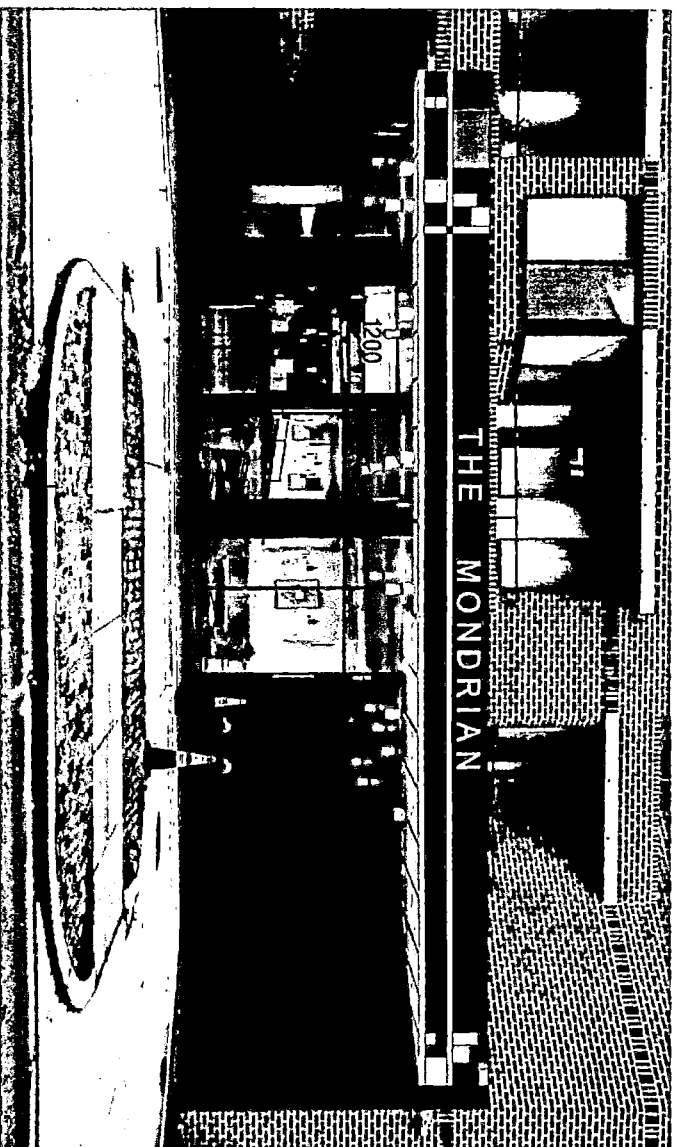
1961: Denver



MONDRIAN COLORADO, Denver (est. 1961)

Plaintiff is Late to the Game

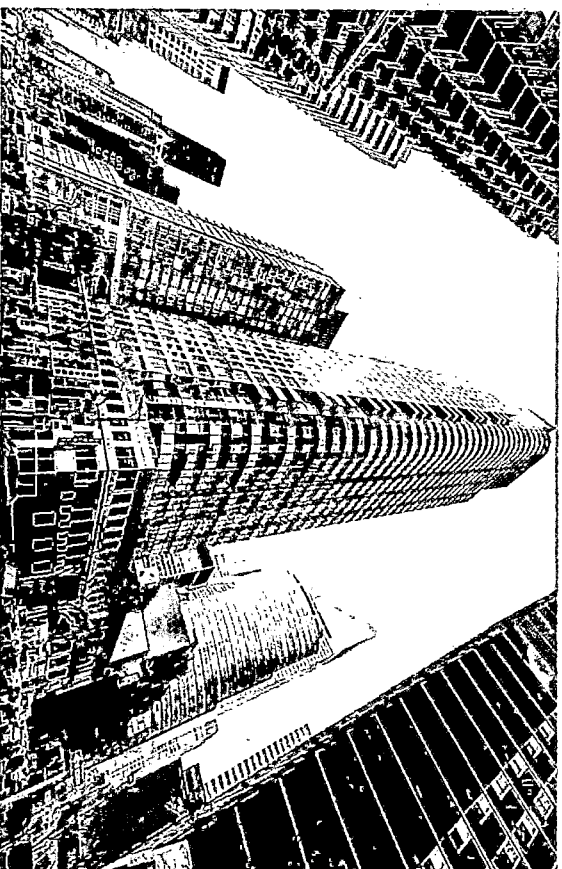
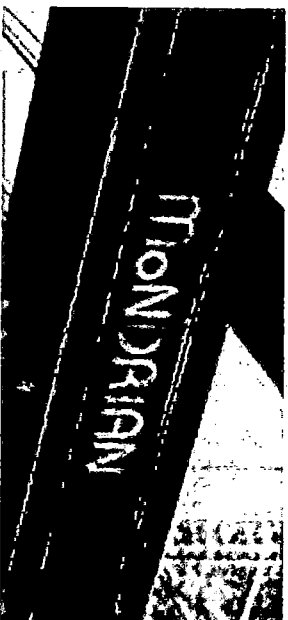
1981: Washington, DC



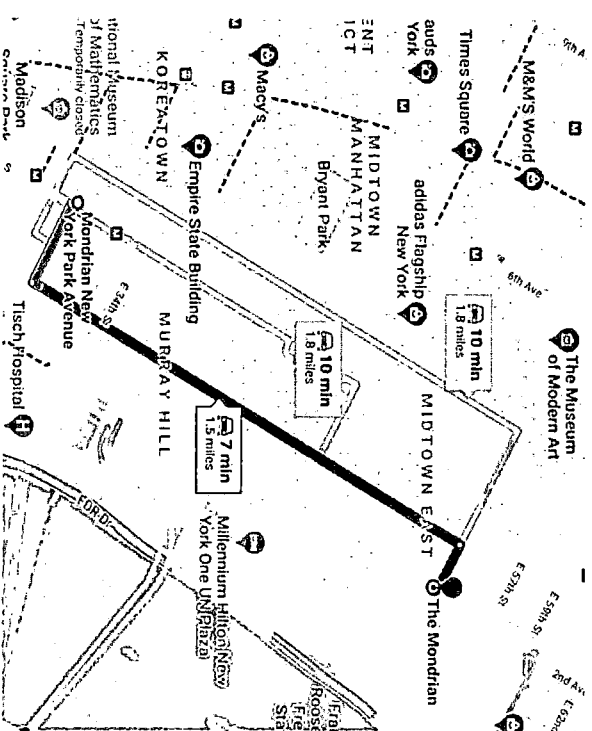
THE MONDRIAN, (est. 1981)

Plaintiff is Late to the Game

1990: THE MONDRIAN in New York City



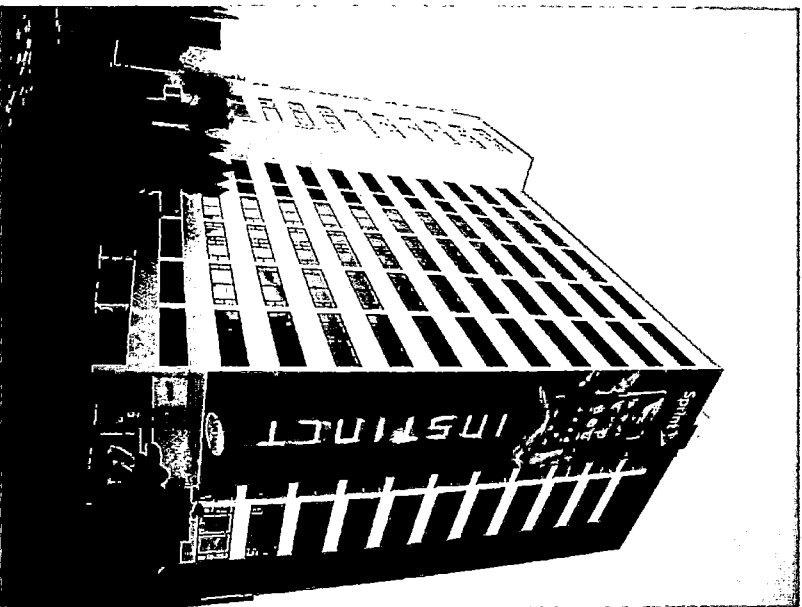
THE MONDRIAN condo building, New York (est. 1990)



Located 7 min away from Plaintiff's
Mondrian New York park Avenue (est. 2017)

Plaintiff is Late to the Game

1996: Plaintiff's MONDRIAN Los Angeles

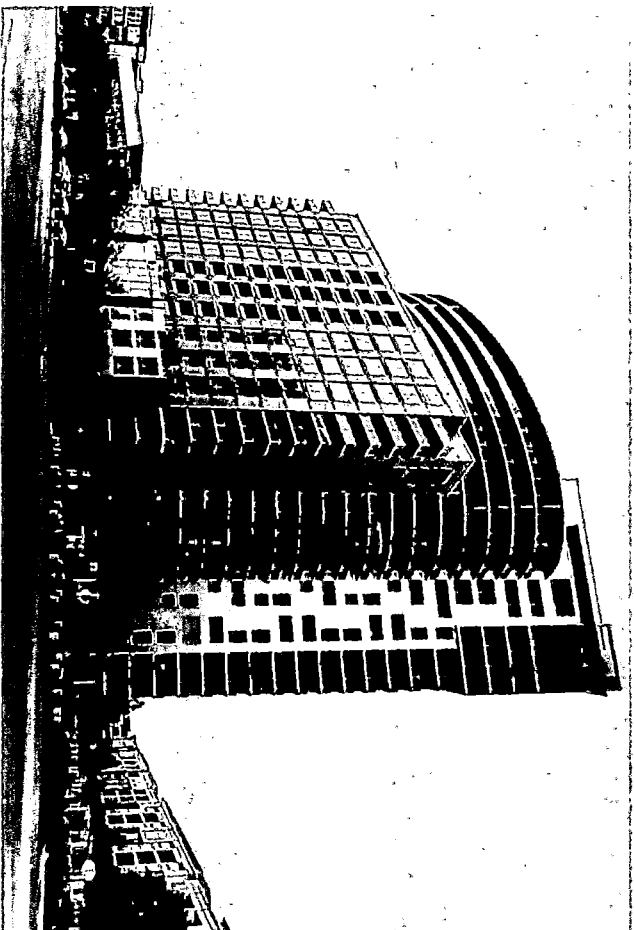


Mondrian Los Angeles (est. 1996)

Plaintiff is Late to the Game

2005: Dallas

3000 BLACKBURN ST. DALLAS, TX 75204	855-246-9755
The Mondrian	
—cityplace—	



The Mondrian Cityplace Luxury Apartments (est. 2005)